

1  
2  
3  
4  
5  
6  
7  
8  
9  
10 **SAO**

11 JOHN B. SHOOK, ESQ.  
Nevada Bar No. 5499

12 ROBERT L. ENGLISH

Nevada Bar No. 3504

13 SHOOK & STONE, CHTD.

710 South 4th Street

Las Vegas, NV 89101

14 Office: (702) 385-2220

Attorney for Creditor

15 Charles Carlisi

16 **UNITED STATES BANKRUPTCY COURT**  
17 **DISTRICT OF NEVADA**

18 In re:

19 RAQUEL MENENDEZ

20 Debtor .

Case No.: 20-16271  
Chapter 7 Bankruptcy

21 **STIPULATION AND ORDER FOR**  
22 **RELIEF FROM AUTOMATIC STAY**

23  
24 IT IS HEREBY STIPULATED AND AGREED TO by and between Creditor CHARLIE  
25 CARLISI, by and through his counsel of record JOHN B. SHOOK, ESQ. and ROBERT  
26 ENGLISH, ESQ., of the law firm SHOOK & STONE, and Debtor RAQUEL MENENDEZ by and  
27 through her counsel of record, CHRISTINE OWEN, ESQ. of the LAW OFFICES OF  
28 CHRISTINE M. OWEN as follows:

1           1.       That the certain personal injury action pending in the District Court for Clark  
2 County Nevada, Case No. A-20-825889-C, the automatic stay of 11 U.S.C. Section 362 be vacated  
3 and Charlie Calisi shall have relief from the automatic stay to proceed in the Personal Injury action  
4 against the debtor.

5           2.       That Charlie Calisi will rely solely on insurance policies to satisfy any judgment  
6 entered against the Debtor in connection with the personal injury action.

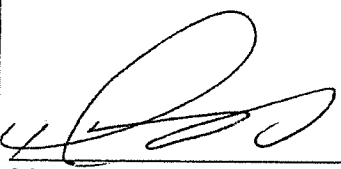
7           3.       That the Debtor insurance policies has been tendered in the above personal injury  
8 action.

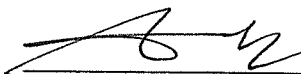
9           4.       That the Trustee's right, if any, to pursue a bad faith action against the Debtor's  
10 insurer in the event Charlie Calisi obtains a judgment against Debtor in excess of any insurance  
11 proceeds is not affected by the instant Order.

12           5.       That the Trustee's right to assign to Charlie Carlisi the rights to pursue a bad faith  
13 action, if any, against the Debtor's insurer, is not affected by the instant Order.

14           DATED this 27<sup>th</sup> day of January, 2021.

15           DATED this 1<sup>st</sup> day of ~~January~~ <sup>February</sup>, 2021.

16  
17  
18  
19   
20 JOHN B. SHOOK, ESQ.  
21 Nevada Bar No. 5499  
22 ROBERT L. ENGLISH, ESQ.  
23 Nevada Bar No. 3504  
24 SHOOK & STONE, CHTD.  
25 710 South Fourth Street  
26 Las Vegas, Nevada 89101

19  Alyssa Hiji, Esq.  
20 CHRISTINE OWEN, ESQ. for  
21 Nevada Bar No. 9141  
22 LAW OFFICE OF CHRISTINE OWEN  
23 509 South Seventh Street  
24 Las Vegas, Nevada 89101  
25 Attorney for Debtor Raquel Menendez